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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Rosa Isela Rivera,

Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,

Defendant.

Case No. 1:23-cv-00900-BAM

STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from November 13, 2023 to December 13, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the weeks of November 13, 2023 and November  
2 20, 2023 and November 20, 2023 Counsel has six Merit briefs and five Reply  
3 briefs due. Counsel requires additional time to brief the issues thoroughly for the  
4 Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: November 13, 2023 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Jonathan Omar Pena  
12 JONATHAN OMAR PENA  
13 Attorneys for Plaintiff  
14

15 Dated: November 13, 2023 PHILLIP A. TALBERT  
16 United States Attorney  
17 MATHEW W. PILE  
18 Associate General Counsel  
19 Office of Program Litigation  
20 Social Security Administration

21 By: \*/s/ Justin Lane Martin  
22 Justin Lane Martin  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on November 13, 2023)  
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**ORDER**

Pursuant to stipulation, Plaintiff shall file and serve Defendant with Plaintiff's Motion for Summary Judgment on or before **December 13, 2023**.

IT IS SO ORDERED.

Dated: **November 15, 2023**

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE